

EXHIBIT “C”

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

CASE NO.: 2:23-cv-00118-NDF

STEPHANIE WADSWORTH,
Individually and as Parent
and Legal Guardian of W.W.,
K.W., G.W., and L.W., minor
children, and MATTHEW WADSWORTH,
Plaintiffs,

vs.

WALMART, INC., and JETSON
ELECTRIC BIKES, LLC,

Defendants.

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REMOTE VIDEOTAPED ZOOM DEPOSITION OF
CHARITY ROWSEY, CPA

DATE: Tuesday, November 5, 2024

TIME: 10:01 a.m. MST - 11:46 a.m. MST

STENOGRAPHICALLY Elizabeth M. Love

REPORTED BY: Registered Professional Reporter

1 A. Yes.

2 Q. Okay. In referring to The Dollar Value of a
3 Day and specifically the category that you looked at --
4 and let me see if I can flip over to it. You referenced
5 Table 182, married woman, unemployed, spouse employed,
6 all ages, with minor children in home, correct?

7 A. Correct.

8 Q. Okay. Did you look at any other tables in this
9 resource to see if it better applied to Mrs. Wadsworth?

10 A. I didn't until I was preparing for this
11 deposition and I realized they had a house makers or
12 homemakers, which I have never used, which tells you how
13 many women are doing that these days. But that category
14 would be more appropriate, which resulted in a dollar
15 value of a day of about \$80 a day.

16 Q. Yeah. And don't let my wife hear what you just
17 said, please.

18 All right. And so I think -- let me make sure
19 that I've got the right one here. And I can flip to it.
20 No, it won't let me flip to it like that.

21 I believe it's Table 223, married women,
22 homemaker, not in labor force, spouse employed, all
23 ages, at least as it applies to Mrs. Wadsworth, youngest
24 child ages six through twelve. Do you agree that this
25 is the table that more accurately would apply to

1 Mrs. Wadsworth?

2 A. Yes. Does that -- I can't -- maybe if I put my
3 glasses on.

4 Q. Sorry. I can --

5 A. It's about \$80. Yeah. Yes.

6 Q. Okay. All right. And so instead of the \$64.20
7 per day referenced in your report, the more accurate
8 number would be \$80.94 for Mrs. Wadsworth?

9 A. Correct.

10 Q. Okay. And in looking at this particular table,
11 that \$80.94 takes into account inside housework, food
12 cooking and cleanup, pets, home and vehicles, household
13 management, shopping, obtaining services and travel for
14 household activity, correct?

15 A. Correct.

16 Q. The \$80.94 does not take into account child
17 care, correct?

18 MR. GIROUX: Form.

19 THE WITNESS: Correct.

20 BY MR. AYALA:

21 Q. And so that --

22 A. To the -- to the extent that it's not included
23 in any of those categories.

24 Q. Okay. And so at the very least, what The
25 Dollar Value of a Day, Table 223, provides is that the